

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

ANTHONY PRINCE,

Defendant.

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: SEALED
: SUPERSEDING INFORMATION
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: S3 05 Cr. 1067 (KMK)
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: x

COUNT ONE

(Bank Fraud Conspiracy)

The United States Attorney charges:

1. From at least in or about March 2005 through in or about August 2005, in the Southern District of New York and elsewhere, ANTHONY PRINCE, the defendant, together with others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1344.

2. It was a part and an object of the conspiracy that ANTHONY PRINCE, the defendant, together with others known and unknown, unlawfully, willfully, and knowingly, would and did execute, and attempt to execute, a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, said financial

institutions, by means of false and fraudulent pretenses, representations, and promises, to wit, PRINCE and his co-conspirators defrauded numerous banks by depositing and causing to be deposited counterfeit checks into accounts at such banks, as well as proceeds from such checks, in violation of Title 18, United States Code, Section 1344.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, ANTHONY PRINCE, the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about April 5, 2005, Douglas Shyne, a co-conspirator not named as a defendant herein, sent by Federal Express a counterfeit check in the amount of approximately \$375,000, drawn on a Wachovia Bank account, from New York, New York, to ANTHONY PRINCE in Virginia Beach, Virginia.

b. On or about April 6, 2005, Steven Riddick, a co-conspirator not named as a defendant herein, caused the \$375,000 counterfeit check to be deposited into the bank account for his business, "Steve Riddick Sports Training, Inc.," at RBC Centura Bank (the "Riddick Account").

c. On or about May 9, 2005, Douglas Shyne sent by Federal Express a counterfeit check in the amount of approximately \$450,000, drawn on a Wachovia Bank account, to

ANTHONY PRINCE, in Virginia Beach, Virginia.

d. On or about May 10, 2005, Steven Riddick caused the \$450,000 counterfeit check to be deposited into the Riddick Account.

e. In or about April 2005, Douglas Shyne sent by Federal Express a counterfeit check in the amount of approximately \$850,000, drawn on a Wachovia Bank account, from New York, New York, to ANTHONY PRINCE in Virginia Beach, Virginia.

f. On or about April 26, 2005, Nathaniel Alexander, a co-conspirator not named as a defendant herein, caused the \$850,000 Counterfeit Check to be deposited into the bank account for his business, B&T Petroleum, at SunTrust Bank (the "B&T Account").

g. On or about April 27, 2005, ANTHONY PRINCE sent a Federal Express package from Virginia Beach, Virginia to Douglas Shyne, containing checks drawn on the B&T Account.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Bank Fraud)

The United States Attorney further charges:

4. From at least in or about March 2005 through in or about August 2005, in the Southern District of New York and elsewhere, ANTHONY PRINCE, the defendant, unlawfully, willfully, and knowingly, did execute and attempt to execute a scheme and

artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, said financial institutions, by means of false and fraudulent pretenses, representations, and promises, to wit, PRINCE defrauded Wachovia Bank, RBC Centura Bank, and SunTrust Bank, among other banks, by depositing and causing to be deposited into accounts at RBC Centura Bank and SunTrust Bank, among other banks, counterfeit checks drawn from accounts on Wachovia Bank, among other banks.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT THREE

(Money Laundering Conspiracy)

The United States Attorney further charges:

5. From at least in or about March 2005 through in or about August 2005, in the Southern District of New York and elsewhere, ANTHONY PRINCE, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(B)(i).

6. It was a part and an object of the conspiracy that ANTHONY PRINCE, the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial

transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions, which in fact involved proceeds of specified unlawful activity, to wit, bank fraud, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

OVERT ACTS

7. In furtherance of the conspiracy and to effect the illegal object thereof, ANTHONY PRINCE, the defendant, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about April 5, 2005, Douglas Shyne, a co-conspirator not named as a defendant herein, sent by Federal Express a counterfeit check in the amount of approximately \$375,000, drawn on a Wachovia Bank account, from New York, New York, to ANTHONY PRINCE in Virginia Beach, Virginia.

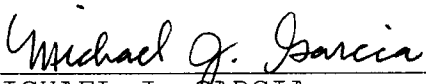
b. On or about April 6, 2005, Steven Riddick, a co-conspirator not named as a defendant herein, caused the \$375,000 counterfeit check to be deposited into the bank account for his business, "Steve Riddick Sports Training, Inc.," at RBC Centura Bank (the "Riddick Account").

c. In or about April 2005, ANTHONY PRINCE sent checks

drawn on the Riddick Account to Douglas Shyne, in order that those checks would then be distributed to Douglas Shyne's designees.

d. From in or about April 2005 through in or about May 2005, at least five co-conspirators not named as defendants herein deposited checks drawn on the Riddick Account, constituting proceeds of the \$375,000 counterfeit check, into their bank accounts, and thereafter funneled certain of the proceeds back to Douglas Shyne.

(Title 18, United States Code, Section 1956(h).)


MICHAEL J. GARCIA
United States Attorney

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(Title 18, Sections 1344, 1349, 1956(h), and 2).

MICHAEL J. GARCIA
United States Attorney.
